

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANATOLIY MIKITYUK, MITCH  
TALLUNGAN, and WADE HONEY, individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

CISION US INC. and CISION LTD.,

Defendants.

Case No. 21-cv-00510-LJL

**NOTICE OF REWEVED MOTION  
FOR LEAVE TO FILE A THIRD  
AMENDED COMPLAINT**

*Oral Argument Requested*

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Renewed Motion for Leave to File a Third Amended Complaint, and the Declaration of Melissa L. Stewart in Support of Plaintiffs' Renewed Motion and exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order granting Plaintiffs leave to file the Third Amended Complaint, attached to the Declaration of Melissa L. Stewart as Exhibit B.

Dated: October 21, 2021  
New York, NY

Respectfully submitted,

By: /s/ Melissa L. Stewart  
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and the Putative Classes*

*\*Admitted Pro Hac Vice*

**CERTIFICATION OF SERVICE**

I hereby certify that on October 21, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to counsel of record in this matter.

By: /s/ *Melissa L. Stewart*  
Melissa L. Stewart